

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

DEC 7 - 2001

Judge Robert W. Gettleman
United States District Court

THE CIT GROUP/BUSINESS
CREDIT, INC.

Plaintiff,

v.

JOHN PREPOLEC,

Defendant.

Case No. 01 C 8876

Hon. Robert W. Gettleman
Courtroom 1703

DOCKETED

DEC 13 2001

NOTICE OF MOTION

PLEASE TAKE NOTICE that on Wednesday, the 12th day of December, 2001, at the hour of 9:15 a.m., we shall appear before the Hon. Robert W. Gettleman, of the United States District Court for the Northern District of Illinois, or any Judge sitting in his place and stead, in courtroom 1703, 219 South Dearborn Street, Chicago, Illinois, 60604, and then and there present Defendant's Motion For The Entry of an Agreed Order Extending The Time In Which The Defendant Has to Answer or Otherwise Plead to the Complaint, a copy of which is attached hereto and hereby served upon you.

CHAD H. GETTLEMAN, ESQ. (ARDC #944858)
MARK A. CARTER, ESQ. (ARDC #06199602)
ADELMAN, GETTLEMAN, MERENS,
BERISH & CARTER, LTD.
53 W. Jackson Blvd., Suite 1050
Chicago, IL 60604
312/435-1050

Counsel For the Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Notice of Motion and the documents referred to therein were served via facsimile upon the parties listed on the attached Service List this 7th day of December, 2001.


Mark A. Carter, Esq.

SERVICE LIST

E. KING POOR, ESQ.
DAVID A. AGAY, ESQ.
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35 West Wacker Drive
Chicago, IL 60601
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fax:	312/558-5700
from:	Mark A. Carter, Esq.
date:	December 7, 2001
re:	CIT v Prepolc
pages:	7, including cover page

NOTES: Please see attached.

CONFIDENTIAL NOTE

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
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DEC 7 - 2001

THE CIT GROUP/BUSINESS
CREDIT, INC.

Plaintiff,

 \mathbf{v}_i

JOHN PREPOLEC,

Defendant.

Judge Robert W. Gettleman
United States District Court

Case No. 01 C 8876

Hon. Robert W. Gettleman

ROCKET
DEC 13 2001

**MOTION FOR THE ENTRY OF AN
AGREED ORDER EXTENDING THE TIME
IN WHICH THE DEFENDANT MAY ANSWER OR
OTHERWISE PLEAD TO THE COMPLAINT**

4. In light of these circumstances, Defendant requests that Defendant be granted time to file an answer or other responsive pleading, including but not limited to any motion based upon a defense of lack of jurisdiction over the person, improper venue, insufficiency of process or insufficiency of service of process, to the complaint in this case.

5. Plaintiff has agreed that Defendant may file an answer or other responsive pleading as requested herein on or before January 4, 2002.

6. Defendant has been diligent and no party in interest will be prejudiced by the extension sought herein.

WHEREFORE, John Prepolec, named defendant herein, prays that this Court enter an Order, in the form attached hereto, extending the time in which Defendant may answer or otherwise plead to the complaint in this case, and for such further relief as is just and equitable in the premises.

JOHN PREPOLEC

By: 
One of His Attorneys

CHAD H. GETTLEMAN, ESQ. (ARDC #944858)
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STIPULATED AND AGREED TO THIS 7th DAY OF DECEMBER, 2001:

JOHN PREPOLEC

CIT GROUP/BUSINESS CREDIT, INC.

By: Mark A. Carter
One of His Attorneys

By: [Signature]
One of Its Attorneys

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